



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
IDAHO OPERATIONS OFFICE
1435 N. Orchard St.
Boise, Idaho 83706

April 28, 2011

Barry Koch
Special Projects Lead – Mining
Monsanto Company
P.O. Box 816
Soda Springs, Idaho 83276

Re: Conditional Approval of *Ballard Mine Shop Investigation Sampling and Analysis Plan, Revision 2 Draft*, prepared for P4 Production by MWH, April 2011.

Dear Mr. Koch,

The Agencies and Tribes (A/T) have reviewed the above referenced deliverable submitted by P4. This work product was developed pursuant to the 2009 RI/FS Settlement Agreement. All previous A/T comments have been addressed. The following comments are new and should be easy to incorporate into the final SAP. Because these comments appear to be minor, and additional comments are not anticipated, we are now providing conditional approval of the SAP.

If no further discussion is needed, it's our understanding that you will submit a final version of the deliverable to the A/T for our records and final approval. Please contact me if you have questions or concerns. I can be reached at 208-378-5763 or electronically at tomten.dave@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Dave".

Dave Tomten
Remedial Project Manager

Enclosure

cc: Cary Faulk, MWH (electronic version only)
Vance Drain, MWH (electronic version only)
Mike Rowe, IDEQ
Mary Kaufman, FS

USEPA SF



1411928

Jim Alexander, USDA
Forest Service - Enoch Valley Site Record
Jeff Cundick, BLM
Sandi Fisher, US FWS
Kelly Wright, Shoshone Bannock Tribes
Susan Hanson (for the tribes)
Colleen O'Hara, BLM (electronic version only)
Eldine Stevens, BIA (electronic version only)
Tim Mosko, CH2MHill (electronic version only)
Sherri Clark, FS (electronic version only)
Charles Allbritton, EPA Records Center (electronic version only)

Comments on P4's *Ballard Mine Shop Investigation Sampling and Analysis Plan, Revision 2 Draft*, prepared for P4 Production by MWH, April 2011.
April 28, 2011

Specific Comments

Appendix A, Table 4.10. In the "Compound Identification" row, "Corrective Action/Lab Flagging Criteria" column, add text to the effect that qualification of detects will be carried out as described under validation flagging. The laboratory should not be reporting detects as ND when these criteria are not met. The laboratory should use professional judgment in qualifying detects as is described under the validation column.

Editorial Comments

Appendix A, Section 4.5, page 4-13, bullet 2, line 3. Delete space between verification and the subsequent comma.

Appendix A, Section 4.5, page 4-13, bullet 2, line 4. Delete "and."

Appendix C of Appendix A, Laboratory Data Consultants, Inc., Data Validation Report, Polychlorinated Biphenyls by GC SW-846 Method 8082, page 5. There are two sections labeled IX.